

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

In re §  
J.A.R. CONCRETE, INC., § Case No. 23-30242-HCM-11  
Debtor. §

And

In re §  
PASO DEL NORTE MATERIALS, LLC, § Case No. 23-30252-HCM-11  
Debtor. §

**DEBTOR-IN-POSSESSION'S EXHIBIT AND WITNESS LISTS FOR HEARING  
ON MOTION OF WALLWORK FINANCIAL FOR RELIEF FROM THE AUTOMATIC  
STAY, OR ALTERNATIVELY, FOR ADEQUATE PROTECTION AND WAIVER OF  
30-DAY REQUIREMENT**

EXHIBITS				
EXHIBIT NUMBER	DESCRIPTION	O F F E R E D	O B J E C T I O N	A D M I T T E D
1.	Proof of Insurance			
2.	Photographs of the collateral			
3.	Agreed Order for adequate protection payments on the F750 Water Tanker			

<b>WITNESS LIST</b>		
<b>Witness Number</b>	<b>Witness Name</b>	<b>Nature of Testimony</b>
1.	SEAN KELLEY	He is a Certified Equipment Appraiser who has consulted various commercial indexes of value and researched for comparable sales online. He will give his opinions of value, based on mileage and hours.
2.	JOE A. ROSALES, JR	Principal officer of both Debtors. He is expected to testify that the equipment is in good condition, was purchased upon aggressive amortizations, is not in heavy use, and is needed for reorganization either in operations or for sale at arm's length.

Respectfully submitted this 21<sup>st</sup> day of July, 2023.

/s/

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Attorney for the Debtor-in-Possession

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 21<sup>st</sup> day of July, 2023, I did cause a copy of the foregoing Exhibit And Witness Lists For Hearing On U.S. Fire Insurance Company's Motion For Relief From Stay to be over-night mailed to Ronda Farrar, Courtroom Deputy, U.S. Bankruptcy Court, 903 San Jacinto Blvd., Ste. #322, Austin, TX 78701; and to be emailed to Wallwork Financial, c/o Christopher V. Arisco, carisco@padfieldstout.com; and to Wallwork Financial, c/o Kelsey N. Linendoll, klinendoll@padfieldstout.com.

/s/

E.P. BUD KIRK